

McKool Smith

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November 24, 2020

VIA ECF

The Honorable Ronnie Abrams
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

RE: SCHJS LLC v. Hiscox Insurance Co. Inc. et al, No. 20 Civ. 1299 (RA)

Dear Judge Abrams:

We represent Plaintiff SCHJS LLC in the above-captioned matter. We write jointly with Defendants Hiscox Insurance Company Inc. and Great Northern Insurance Company to request an adjournment of the December 4, 2020 status conference until after March 15, 2021 and an extension of the remaining discovery deadlines in the Court's April 28, 2020 Case Management and Scheduling Order (ECF No. 40) as set forth below. The reason for the adjournment and extension request is because the parties have agreed to attend mediation with a private mediator on December 21, 2020 to attempt to settle the matter without further court intervention. This is the parties' first request for an adjournment or extension of the discovery deadlines.

Proposed Revised Scheduling Order

	Original Date	Proposed Date
All depositions and third-party discovery	November 30, 2020	March 15, 2021
Requests to Admit	December 14, 2020	March 29, 2021
All expert disclosures, including disclosures, reports, production of underlying documents, and depositions	February 1, 2021	May 17, 2021
All discovery	February 1, 2021	May 17, 2021

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We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Robin L. Cohen

Robin L. Cohen

CC: All counsel of record

Application granted. The post discovery conference is hereby adjourned until March 19, 2021 at 2:00 p.m. The parties shall submit a joint letter updating the Court on the status of the case by no later than March 12, 2021.

SO ORDERED.



Hon. Ronnie Abrams
November 25, 2020